

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA

-against-

NOTICE OF MOTION  
Ind. No. 11 cr 0364 (DRH)

TIMOTHY LASKARIS

Defendant.

-----X

SIR/MADAM:

PLEASE TAKE NOTICE, that upon the Accompanying Memorandum in Support of Motion, with the Declaration and Exhibits annexed thereto, the Indictment and all prior pleadings and proceedings, Defendant TIMOTHY LASKARIS will move the United States District Court for the Eastern District of New York, Federal Plaza, Central Islip, New York, on a date and time to be set by the Court or as soon thereafter as counsel can be heard for an Order which directs:

1. Granting Suppression of property seized from Mr. Laskaris' residence;
2. Granting Suppression of post arrest statements made by Mr. Laskaris to law enforcement officers;
3. Provision of a Bill of Particulars Pursuant to Rule 7 of the Federal Rules of Criminal Procedure;
4. Disclosure of *Brady* Material; and
5. Any other relief the Court deems just and proper.

Dated:       October 15, 2012  
              Great Neck, New York

Respectfully submitted,  
/s/  
JEFFREY G. PITTELL  
Maher & Pittell, LLP  
*Attorneys for Defendant*  
299 East Shore Rd  
Great Neck, NY 11023  
(516) 829-2299

TO:   AUSA Allen Bode